

# **Exhibit 14**

**THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MASSACHUSETTS**

AMERICAN FEDERATION OF  
TEACHERS MASSACHUSETTS,  
38 Chauncy Street  
Suite 402  
Boston, MA 02111

and

AMERICAN FEDERATION OF TEACHERS,  
555 New Jersey Avenue N.W.  
Washington, D.C. 20001

*Plaintiffs,*

v.

LINDA MCMAHON, in her official capacity as  
Secretary of Education,  
400 Maryland Avenue S.W.  
Washington, D.C. 20202

and

U.S. DEPARTMENT OF EDUCATION,  
400 Maryland Avenue S.W.  
Washington, D.C. 20202

*Defendants.*

Civil No. 25-cv-10677

**DECLARATION OF TODD WOLFSON**

I, Todd Wolfson, declare as follows:

**Background**

1. I am over eighteen years old, of sound mind, and fully competent to make this declaration. I also have personal knowledge of the factual statements contained herein.
2. I have a Ph.D. in Anthropology and Social and Cultural Foundations of Education from the University of Pennsylvania.
3. I am the President of the American Association of University Professors (“AAUP”). I was elected to this role in October 2024. I have held various leadership roles in the Rutgers chapter of AAUP, AAUP-AFT, including as its President and Vice President.
4. AAUP is a membership association and labor union of faculty and academic professionals with chapters at colleges and universities throughout the country.
5. AAUP is a 501(c)(6) organization headquartered in Washington, D.C.
6. The mission of AAUP is to advance academic freedom and shared governance, define fundamental professional values and standards for higher education, promote the economic security of academic workers, and ensure higher education’s contribution to the common good.
7. AAUP was founded by John Dewey and other preeminent scholars in 1915 to defend the ability of scholars, researchers, and educators to teach, write, and research without political and economic retaliation based on their viewpoints.
8. Over one century later, AAUP finds itself revisiting several of the core issues that prompted its founding.
9. AAUP represents more than 43,000 faculty, librarians, graduate students, and academic professionals with members at institutes of higher education across the United States, including members in every state.

10. The Institute for Education Sciences (“IES”) produces statistics relied on by University faculty and AAUP members in their research and for teaching in education programs.

11. For example, one member uses data from the National Center for Education Statistics, part of the IES, constantly. In particular, because he studies higher education, he relies on the Integrated Postsecondary Education Data System (IPEDS), which contains data on finance, enrollments, admissions, staffing and other characteristics of colleges and universities going back to the 1980s. They allow him to study state policy and institutional productivity. Without these data, it is hard to imagine how he could produce rigorous research that helps to improve higher education and hold both institutions and states accountable for meeting the needs of their communities. Thus, losing this data threatens his ability to do his job.

12. Faculty and faculty organizations, including AAUP members and chapters, also rely on data produced by National Center for Education Statistics (NCES) on things such as faculty salary, number of faculty at different institutions, and student tuition when negotiating faculty salary and determining which institution to seek employment.

13. Since 1993, the Integrated Postsecondary Education Data System (IPEDS) program department of NCES has gathered data from US colleges and universities, and is the authoritative source of information on student enrollment, graduation rates, and financial aid. IPEDS has also documented patterns of faculty appointments and salaries, graduate student employment, institutional finances, and many other important areas. The AAUP Department of Research and Public Policy has relied on IPEDS data to help AAUP chapter leaders and college administrators make informed decisions about faculty compensation and to assess the financial health of their institutions. For example, the department is currently assisting Mitchell College Faculty Local 3249 and Mitchell College administration in their collective bargaining

negotiations by helping them gather and interpret the latest IPEDS data on faculty salaries, student enrollment, and finances for the college and a set of comparison institutions. IPEDS has consistently provided the accurate, complete, and timely data required for this type of work.

14. AAUP members also rely on the public interest loan repayment programs.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 28, 2025

By: /s/ Todd Wolfson

Todd Wolfson